EXHIBIT 11

FILED UNDER SEAL

In the Matter Of:

FAIR ISAAC CORPORATION

vs

FEDERAL INSURANCE COMPANY, et al.

RAMESH PANDEY

November 13, 2018

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1 we'll move on from there.
2   MR. FLEMING: He did say that, but...
3   A.   I don't recall it. I don't remember
4 it.
5   MR. FLEMING: That's what he said.
6   Q.   I did not hear that answer so...
7   A.   I was just telling that the guy
8 started, you know, this was created in May. It was
9 too early for me, probably.
10   Q.   Good.
11   A.   I was learning more Chubb at that
12 time.
13   Q.   Okay.
14   (Deposition Exhibit 160, e-mail
15   string FED003522_0001 to FED003522_0004
16   marked Confidential and attachment, was
17   marked for identification.)
18   Q.   This document, Exhibit 160, you see
19 in the first page from its date, July 7, 2014, is, I
20 guess, similarly at the beginning of your time with
21 the company.
22   You're not shown as being on the
23 e-mail.
24   A.   Yeah, I'm not.
25   Q.   Okay. Can you identify the nature of

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1 the attachment entitled, "CAZ ChEAR report"? Do you
2 know what that means?
3   A.   "ChEAR," Chubb Enterprise
4 Architecture report.
5   Q.   And --
6   A.   "CAZ," Canada zone probably. I'm
7 guessing. But I never heard about this word "CAZ."
8   Q.   Before the lunch, you weren't
9 remembering what "CAZ" meant.
10   A.   Yeah, that's what I'm saying. I know
11 I heard of this, "CAZ."
12   But really what we use to the naming
13 Canada we used "Z" for "Zone," right. And "CA" --
14 but Canada is a country, not a Zone. So it doesn't
15 make sense.
16   Q.   Alright. And as I read this document
17 under column "N" --
18   MR. FLEMING: Talking about the
19 attachment?
20   MR. HINDERAKER: I am. Thank you.
21   Q.   With the document being 1 of 2, you
22 know, the attachment on the page being 1 of 2?
23   A.   Yeah.
24   Q.   It identifies data center location.
25   A.   Yeah, in column "N."

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1   Q.   Yes.
2   (There is a discussion off the
3   record.)
4   A.   Column "N" for Nancy.
5   Q.   And then you see "Raleigh" is
6 identified a couple of times.
7   That's Raleigh, North Carolina?
8   A.   Yes, data center.
9   Q.   And then it identifies Toronto as a
10 data center?
11   A.   Yes.
12   Q.   Is Toronto still a data center for
13 Blaze Advisor?
14   A.   I don't think so. With Toronto --
15 what happened, actually, we are consolidating the
16 data centers. We had 48 data centers before.
17 Raleigh was one of them. Canada was another one.
18   Q.   Before when, if I can interrupt?
19   A.   Before merger.
20   Q.   Okay.
21   A.   And after that, we made that we need
22 only eight data centers. And Canada was not one of
23 those eight. So we are migrating everything to
24 Raleigh.
25   Q.   How many data centers today are there

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1 in the United States?
2   A.   Oh, you have to have only two,
3 primary and secondary.
4   Q.   And they are located where?
5   A.   Raleigh and Salisbury, Connecticut.
6   Q.   And outside of the United States
7 today, where are the data centers located?
8   A.   So, for Latin America, it's either
9 somewhere in Texas, Dallas, I think. For Europe,
10 it's in Crowley (phonetic), London. Singapore, I
11 think, but that's not my -- I'm not...
12   Q.   You said there were eight data
13 centers today?
14   A.   I'm just -- two of them I know.
15 Other one I know because it's in Dallas, but it
16 supports the Latin America, all the...
17   And Crowley (phonetic) I know because
18 that's sort of -- but I think it's one in Singapore.
19 Other one I don't know where they are.
20   Q.   Okay. Do you know if there's one in
21 Australia, a data center?
22   A.   No, I don't think so. I don't know.
23   Q.   You don't one way or the other?
24   A.   I don't know.
25   Q.   Are all of the applications --

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1 speaking today, are all of the applications that
2 support insurance policies sold in Canada hosted
3 from the data center in Raleigh?
4   A.   Raleigh.
5   Q.   Do you know when the migration from
6 the Toronto data center to everything being on the
7 Raleigh data center was completed?
8   A.   Completed no, I don't. Exact date, I
9 don't know. It's somewhere -- it was unleashed 2018
10 or late 2017. But I don't know the exact month.
11   (Deposition Exhibit 161, Architecture
12   Introduction - Fiduciary PI Model
13   FED006068_0001 to FED006068_0006 marked
14   Confidential, was marked for
15   identification.)
16   Q.   This Exhibit 161 is dated January 22,
17 2015. It has a title, "Architecture Introduction -
18 Fiduciary PI Model," and it is prepared by Joanne
19 Kelly.
20   Who is Joanne Kelly, if you know?
21   A.   She used to be the architect on the
22 compliance team.
23   Q.   Do you know -- what is your
24 understanding of the meaning of a "fiduciary PI
25 model?"

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1   A.   "PI" the "profitability indicator
2 model? "I don't know why she put the "fiduciary."
3 I don't really know what that is.
4   Q.   Okay, fair enough. Fair enough.
5 That's all I'm asking.
6   Are you familiar with this form of
7 document?
8   A.   Okay. So there are similar documents
9 and I'm guessing that that's all it probably is.
10   MR. FLEMING: He's not asking you to
11 guess.
12   THE WITNESS: Okay.
13   A.   This appears like part of the
14 document which we used to use to capture the scope
15 saying that in the future we are -- we want to do
16 the project and that's how the project will look
17 like, scoping terms stuff.
18   Q.   Okay. Who gives you the "scoping"
19 information?
20   Let me rephrase that question to be
21 more precise.
22   Who gives IT the "scoping"
23 information?
24   A.   It comes from the front people.
25 Sometimes it comes with the operations team, call

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1 center, service center, those guys. Sometimes it
2 comes with the project management team. This is
3 what we want to do, this is what we think we should
4 do. Let's see how much in the bank, how many people
5 we need, how long it will take.
6   Q.   Did you say project management team
7 or product management team?
8   A.   Product managers have the project
9 manager inside. It's like every product they cannot
10 speak IT terms. So they need somebody who is like
11 project manager for products.
12   Q.   Alright. So slowing it down a little
13 bit, we talked earlier this morning about what a
14 "product" is.
15   A.   Yes.
16   Q.   A form of "coverage?"
17   A.   Yeah.
18   Q.   So somebody that is responsible for
19 the product would like to have IT support for the
20 product, that person works with a project manager?
21   A.   Yeah.
22   Q.   Who then interfaces with IT --
23   A.   Yeah, yeah.
24   Q.   -- to describe the desired scope?
25   A.   Yeah.

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1   Q.   Okay. So the original source of the
2 desire for the technology application comes from
3 persons responsible for the products, the forms of
4 coverage?
5   A.   Products or operations.
6   Q.   Or operations?
7   A.   Yeah. Operations guy, they need it
8 because they have to run the report. If somebody
9 asks you like how your office run, how much you
10 bring the money, how much you spend the money.
11   Q.   Okay.
12   A.   Somebody there who creates all the
13 reports, that's not product guys, it's operations
14 guys.
15   Q.   So we've identified "operations"
16 people?
17   A.   Yes.
18   Q.   And we've identified "product"
19 people?
20   A.   Yeah. Product guys are the guy that
21 build the product and they sell. Operations guys is
22 the one who keeps all the documentation.
23   Q.   I understand the difference.
24   And how about the underwriters, do
25 you put them in the "product" category?